

McMANIMON, SCOTLAND & BAUMANN, LLC

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Chapter 11 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

FRUTTA BOWLS FRANCHISING, LLC,

Debtor.

Case No. 19-13230 (MBK)

Chapter 11

Honorable Michael B. Kaplan, Chief U.S.B.J.

Hearing Date and Time:

December 17, 2020, at 10:00 a.m.

**NOTICE OF MOTION OF ANDREA DOBIN, CHAPTER 11
TRUSTEE FOR FRUTTA BOWLS FRANCHISING, LLC FOR
ORDER AUTHORIZING: (A) SALE OF DEBTOR'S ASSETS, FREE
AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES
PURSUANT TO 11 U.S.C. § 363(b), (f), AND (m); (B) ASSUMPTION
AND ASSIGNMENT OF CERTAIN CONTRACTS PURSUANT TO
11 U.S.C. § 365; AND (C) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on **December 17, 2020, at 10:00 a.m.**, or as soon thereafter as the movant may be heard, Andrea Dobin, Chapter 11 Trustee (the "Trustee") for Frutta Bowls Franchising, LLC, Chapter 11 debtor ("Debtor"), shall move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge at the United States Bankruptcy Court, U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order authorizing: (A) the sale of the Debtor's assets, free and clear of liens, claims and encumbrances pursuant to 11 U.S.C. § 363(b), (f) and (m); (B) assumption and assignment of certain contracts pursuant to 11 U.S.C. § 365; and (C) for related relief (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the Trustee will rely upon her Certification and Memorandum of Law filed in support of the relief requested.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-1.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting the relief requested herein is submitted herewith and made part of the Motion herein.

**McMANIMON, SCOTLAND
& BAUMANN, LLC**
*Counsel to Andrea Dobin,
Chapter 11 Trustee*

By: _____ */s/ Michele M. Dudas* _____
MICHELE M. DUDAS

Dated: November 18, 2020